

Washington the final authority to grant such applications. This change reflected a recognition of the increasing number of requests to take off-reservation land into trust for gaming and the complex issues that such requests implicated.⁷⁰ The policy was reaffirmed formally by Assistant Secretary for Indian Affairs Ada Deer in a May 26, 1994, memorandum to all BIA Area Directors. Under the centralized arrangement, the local agency was still responsible for working with the applicant tribe to collect the required information. Specifically, the Area Office was responsible for (1) ensuring that all of the necessary information was included with the tribe's application before forwarding it to the central office in Washington, D.C., and (2) making a recommendation based on that information. To address these gaming acquisition issues more effectively, in January 1992 Secretary Lujan also created the Indian Gaming Management Staff within the BIA. Area Office recommendations for off-reservation gaming were to be submitted to IGMS in Washington, which would review the Area Office recommendation and make its own recommendation to the Assistant Secretary.

Around March 1992, Secretary Lujan appointed Hilda Manuel as the first IGMS Director. Manuel served as Director through September 1994. In May 1994, Manuel was named acting Deputy Commissioner of the BIA, a career senior executive service position. She served both in that position and as the IGMS Director until September 1994, when she was formally appointed as Deputy Commissioner. In that office, Manuel is the operational chief of the BIA.

⁷⁰Witnesses, including BIA Deputy Commissioner Hilda Manuel and former Solicitor's Office staff attorney Penny Coleman, confirmed that this policy change reflected these concerns, and was ordered amidst growing concern that Indian gaming was taking place without proper authorization or regulatory oversight.